

Steven J. Kahn (CA Bar No. 76933)  
Gail S. Greenwood (CA Bar No. 169939)  
PACHULSKI STANG ZIEHL & JONES LLP  
10100 Santa Monica Blvd., 13th Floor  
Los Angeles, California 90067  
Telephone: 310/277-6910  
Facsimile: 310/201-0760  
E-mail: skahn@pszjlaw.com  
ggreenwood@pszjlaw.com

Counsel for St. Vincent Medical Center, Seton  
Medical Center, O'Connor Hospital, and Saint  
Louise Regional Hospital

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

In re

VERITY HEALTH SYSTEM OF CALIFORNIA,  
INC., *et al.*,

Debtors and Debtors in Possession.

- ☐ Affects All Debtors
- ☐ Affects Verity Health System of California, Inc.
- ☒ Affects O'Connor Hospital
- ☒ Affects Saint Louise Regional Hospital
- ☐ Affects St. Francis Medical Center
- ☒ Affects St. Vincent Medical Center
- ☒ Affects Seton Medical Center
- ☐ Affects O'Connor Hospital Foundation
- ☐ Affects Saint Louise Regional Hospital Foundation
- ☐ Affects St. Francis Medical Center of Lynwood Foundation
- ☐ Affects St. Vincent Foundation
- ☐ Affects St. Vincent Dialysis Center, Inc.
- ☐ Affects Seton Medical Center Foundation
- ☐ Affects Verity Business Services
- ☐ Affects Verity Medical Foundation
- ☐ Affects Verity Holdings, LLC
- ☐ Affects De Paul Ventures, LLC
- ☐ Affects De Paul Ventures - San Jose Dialysis, LLC

Lead Case No. 2:18-bk-20151-ER

Jointly administered with:

Case No. 2:18-bk-20162-ER;  
Case No. 2:18-bk-20163-ER;  
Case No. 2:18-bk-20164-ER;  
Case No. 2:18-bk-20165-ER;  
Case No. 2:18-bk-20167-ER;  
Case No. 2:18-bk-20168-ER;  
Case No. 2:18-bk-20169-ER;  
Case No. 2:18-bk-20171-ER;  
Case No. 2:18-bk-20172-ER;  
Case No. 2:18-bk-20173-ER;  
Case No. 2:18-bk-20175-ER;  
Case No. 2:18-bk-20176-ER;  
Case No. 2:18-bk-20178-ER;  
Case No. 2:18-bk-20179-ER;  
Case No. 2:18-bk-20180-ER;  
Case No. 2:18-bk-20181-ER

Chapter 11 Cases

Hon. Ernest M. Robles

ST. VINCENT MEDICAL CENTER, a California nonprofit public benefit corporation, SETON MEDICAL CENTER, a California nonprofit public benefit corporation, O'CONNOR HOSPITAL, a California nonprofit benefit corporation, and SAINT LOUISE REGIONAL HOSPITAL, a California nonprofit public benefit corporation,

Plaintiffs,

v.

BLUE SHIELD OF CALIFORNIA PROMISE HEALTH PLAN f/k/a CARE 1<sup>ST</sup> HEALTH PLAN, a California corporation,

Defendant.

Adversary No. 20-ap-01559-ER

**STIPULATION TO CONTINUE HEARING ON DEFENDANT'S MOTION TO (1) DISMISS CLAIMS FOR TURNOVER, VIOLATION OF THE AUTOMATIC STAY AND UNJUST ENRICHMENT; AND (2) COMPEL ARBITRATION AND STAY ADVERSARY PROCEEDING**

**[Related to Docket No. 12]**

Present Hearing:

Date: November 24, 2020  
Time: 11:00 a.m.  
Place: Courtroom 1568  
255 East Temple Street  
Los Angeles, CA 90012

The Parties to the above-encaptioned adversary proceeding, plaintiffs St. Vincent Medical Center, Seton Medical Center, O'Connor Hospital, and Saint Louise Regional Hospital (collectively, "Plaintiffs") and defendant Blue Shield of California Promise Health Plan fka Care 1<sup>st</sup> Health Plan ("Defendant"), by and through their respective counsel, hereby stipulate as follows:

1. Plaintiffs instituted this adversary proceeding through the filing of their *Complaint for Breach of Written Contracts, Turnover, Unjust Enrichment, and Damages for Violation of the Automatic Stay* on August 28, 2020 (the "Complaint") [Docket No. 1].

2. Following an extension of time granted to Defendant to respond to the Complaint, on October 30, 2020, Defendant filed its *Motion to: (1) Dismiss Claims for Turnover, Violation of the Automatic Stay and Unjust Enrichment; and (2) Compel Arbitration and Stay Adversary Proceeding* (the "Motion") [Docket No. 12], set for hearing on November 24, 2020 at 11:00 a.m.

3. Plaintiffs and Defendant are seeking to consensually resolve the issues raised in the Motion without the need for further litigation thereof, including the filing of an opposition to the Motion, and therefore request that the hearing on the Motion be continued to December 16, 2020 at 11:00 a.m. so as to facilitate those efforts.

4. Plaintiffs and Defendant further stipulate and agree that any opposition to the Motion shall be filed and served no later than November 25, 2020.

1  
2 Dated: November 10, 2020

PACHULSKI STANG ZIEHL & JONES LLP

3  
4 /s/ Steven J. Kahn

5 Steven J. Kahn

6 Counsel for St. Vincent Medical Center, Seton Medical  
7 Center, O'Connor Hospital, and Saint Louise Regional  
8 Hospital

9  
10 Dated: November 9, 2020

SNELL & WILMER LLP

11 

12 Michael B. Reynolds

13 Andrew B. Still

14 Counsel for Blue Shield of California Promise Health  
15 Plan fka Care 1<sup>st</sup> Health Plan  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
**10100 Santa Monica Boulevard, 13<sup>th</sup> Floor, Los Angeles, California 90067**

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION TO CONTINUE HEARING ON DEFENDANT'S MOTION TO (1) DISMISS CLAIMS FOR TURNOVER, VIOLATION OF THE AUTOMATIC STAY AND UNJUST ENRICHMENT; AND (2) COMPEL ARBITRATION AND STAY ADVERSARY PROCEEDING** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **November 10, 2020**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Steven J Kahn** skahn@pszyjw.com
- **Michael B Reynolds** mreynolds@swlaw.com, kcollins@swlaw.com
- **Andrew Still** astill@swlaw.com, kcollins@swlaw.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 10, 2020  
Date

Mary de Leon  
Printed Name

/s/ Mary de Leon  
Signature

---

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.